

March 5, 2020

VIA ECF FILING

Hon. Louis L. Stanton, U.S.D.J. United States Southern District Court

Re: Ethereum Ventures, LLC v. Chet Mining Co., LLC, et al.

Case No.: 1:19-cv-07949-LLS

Our File No.: 8461.009

Dear Judge Stanton,

Please be advise that this firm represents the plaintiff in the above referenced case.

This case involves a breach of contract and fraud allegedly committed by Chet Stojanovich and his company, Chet Mining Co., LLC with regard to the sale of Bitcoin mining equipment.

I write in advance of the conference to be held on March 6, 2020 at 12:30 p.m., Courtroom 21C.

Yesterday, I contacted Chet Stojanovich via phone at (310) 824-3930 to discuss the proposed scheduling Order herein pursuant to the conference Order dated February 7, 2020. During our brief conversation, Mr. Stojanovich advised me that he was represented by counsel and that he would forward to me his attorney's information and also advise he would have his attorney contact me to discuss the proposed scheduling order. At noon today, I received a call from Jason Gottlieb, Esq., (212) 735-8837 who advised he may be representing the defendants but had not been formally retained yet.

It is our position that Chet Mining Co., LLC cannot proceed in this matter *Pro Se* and must be represented by counsel pursuant to well settled New York Law.

Plaintiff proposes the following scheduling order:

- a. Depositions of Chet Stojanovich and a representative of Ethereum Ventures, LLC, John Paul Baric to occur by May 29, 2020 (it is requested that John Paul Baric's deposition take place via video conference since he resides out of State);
- b. Production of relevant documents to take place by April 30, 2020;
- c. The plaintiff does not anticipate any expert testimony;
- d. Discovery to be completed by May 15, 2020;
- e. Pre-Trial materials to be provided by plaintiff to defendants by June 26, 2020; and
- f. Pre-Trial Order submitted by July 17, 2020.

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I do not anticipate the need for any limitations on discovery including the need for any Protective/Confidentiality Orders.

It is anticipated that a Jury Trial will take approximately 3 days.

Very truly yours,

E. STEWART JONES HACKER MURPHY, LLP

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JFH:dmd

cc: Jason Gottlieb, Esq. (via e-mail)

Chet Stojanovich (via e-mail & ECF Filing)

Client